

EXHIBIT B

*COPY*UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTSFILED
IN CLERK'S OFFICE

CIVIL ACTION NO. 04-30054-MAP 5 P 4:04

DEBORAH ST. PETER and)	U.S. DISTRICT COURT DISTRICT OF MASS.
MATTHEW BOGACZ,)	
Plaintiffs)	
)	
vs.)	
TOWN OF AGAWAM, TOWN OF AGAWAM)	
POLICE DEPT., AGAWAM POLICE CHIEF)	
ROBERT CAMPBELL, ANTHONY GRASSO,)	
JAMES WHEELER, RICHARD NILES,)	
KEITH BOPKO, JOHN MOCCIO, OFFICER MCGOVERN, Defendants)	

DEFENDANTS' MOTION FOR FURTHER EXTENSION OF TIME TO
COMPLETE DISCOVERY (INCLUDING RESPONDING TO PLAINTIFFS' INTERROGATORIES
AND PRODUCTION REQUESTS) AND FOR A
POSTPONEMENT OF CASE MANAGEMENT CONFERENCE

ASSENTED TO

The defendants in the above matter respectfully move this Court for a further extension of time for completion of discovery and time to respond to plaintiffs' interrogatories and requests for production. The defendants further respectfully move this Court for a postponement of the case management conference now scheduled for January 25, 2005. As grounds for this motion, the defendants state the following.

Despite efforts by the defendants to comply with the Court's requirement that they respond to the plaintiffs interrogatories and requests for production by the end of today, January 5, 2005, their counsel, the undersigned, has now found that that deadline cannot be met. This is due to no fault or lack of diligence on the part of the defendants themselves, but upon the heavy schedule for months of their counsel and his miscalculation of the amount of time that was necessary to gather all relevant and voluminous materials, review them, continue to meet with the defendants, and prepare relevant responses. Defendants' counsel again wishes to emphasize that the defendants have cooperated at all times whenever requested by their counsel, and that any delays in this case are completely because of his own professional

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and personal difficulties. It is respectfully submitted that the defendants themselves should not bear the brunt of any possible sanctions by the Court in this matter for the reason that any such sanctions would have been brought upon by their counsel's own difficulties.

Defendants request that an additional thirty days be granted by the Court to complete their responses to plaintiffs' discovery pleadings, and that thereafter there be granted an additional forty-five days within which all parties may complete non-expert discovery.

ASSENTED TO

THE PLAINTIFFS
DEBORAH ST. PETER AND
MATTHEW BOGACZ

By Lisa Brodeur-McGan
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THE DEFENDANTS
TOWN OF AGAWAM, TOWN OF
AGAWAM POLICE DEPT., AGAWAM
POLICE CHIEF ROBERT CAMPBELL,
ANTHONY GRASSO, JAMES
WHEELER, RICHARD NILES,
KEITH BOPKO, JOHN MOCCIO, OFFICER
MCGOVERN

By JL McCormick
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CERTIFICATE OF CONSULTATION

Counsel for all parties have conferred on this matter and plaintiffs have kindly assented.

The Defendants

By JL McCormick
Jeffrey L. McCormick, Esq.

CERTIFICATE OF SERVICE

I, Jeffrey L. McCormick, Esq., hereby certify that on this 5 day of January, 2005, I served a copy of the above upon the parties in the action by mailing, postage prepaid, to counsel, Lisa Brodeur-McGan, Esq., Cooley Shrair, P.C., 1380 Main Street, Springfield, MA 01103.

Subscribed under the penalties of perjury.

JL McCormick
Jeffrey L. McCormick, Esq.